



School District of Philadelphia  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

*Transmitted via Electronic Mail*

Ms. Kyla L. Townsend-McIntyre  
U.S. Environmental Protection Agency, Region III  
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Self Disclosure Agreement - AHERA  
Chester A Arthur School Annex ULCS #2481

Dear Ms. Townsend-McIntyre

As part of the School District of Philadelphia agreement, effective March 9, 2007 and amended January 18, 2008 with the United States Environmental Protection Agency (EPA), this letter is intended to transmit and certify the Corrective Action Plan (CAP) for the Chester A. Arthur School Annex.

This CAP was written in accordance with the above noted agreement and the "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy).

As this is our initial submittal under the AHERA portion of the agreement, we request that the EPA review this document and provide comments within the next 7 days so that we can correct any gaps or deficiencies prior to the submittal of subsequent reports to the EPA.

As the Responsible Official, I hereby certify that the attached report entitled *CAP - Chester A. Arthur Annex ULCS #2481* submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

If you have any questions or comments please feel free to contact me or Ms. Elizabeth Gutman, Esq.

Sincerely,

Francine Locke, MS  
Director, Environmental Management & Services

Attachment 1 – CAP- Chester A. Arthur Annex ULCS #2481



School District of Philadelphia  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

March 18, 2008

Ms. Renee Musgrove  
Arthur Elementary School  
2007 Christian Street  
Philadelphia, PA 19146

Re: Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit  
Documentation Related to Corrective Action Plan

Dear Ms. Musgrove:

Following the AHERA Environmental Compliance Audit conducted at the Arthur Annex Elementary School on January 29, 2008 the attached documents have been prepared for inclusion into the AHERA environmental management plan at your school and at the Environmental Library located at 440 N. Broad Street.

**The following documents were prepared for the Arthur Annex School and must be inserted into the latest reinspection report (black binder) dated December 2006:**

Exhibit 2 - 3 Year Reinspection and 6 Month Periodic Surveillance Schedule

Exhibit 3 – Copy of the 2006 Reinspection report was printed for the Environmental Library

Exhibit 4 - Asbestos Management Program regarding Operations & Maintenance

Exhibit 5- (DP) Designated Person Contact Information

Exhibit 6– Cross Reference Table linking associated documentation to the management plan

Exhibit 7 - Annual Training Schedule for asbestos abatement workers and new employees  
(included in the Asbestos Management Program)

**School Principal:**

Print Name: Renee Musgrove  
Sign Name: Renee Musgrove  
Date: 3/26/08

**Witnessed by:**

Title: URS  
Print Name: Brian Joseph  
Sign Name: B. Joseph  
Date: 3/26/08

**The following documents were prepared for the AHERA environmental management plan for inclusion in the central files at 440 N. Broad Street:**

Exhibit 2 - 3 Year Reinspection and 6 Month Periodic Surveillance Schedule

Exhibit 3 – Copy of the 2006 Reinspection report was printed for the Environmental Library

Exhibit 4 - Asbestos Management Program regarding Operations & Maintenance

Exhibit 5- (DP) Designated Person Contact Information

Exhibit 6– Cross Reference Table linking associated documentation to the management plan

Exhibit 7 - Annual Training Schedule for asbestos abatement workers and new employees  
(included in the Asbestos Management Program)

**The following document was prepared for the Department of Education and sent via certified mail.**

Exhibit 1 – The 2006 Reinspection Report was sent to the Pennsylvania Department of Education for their records

**Designated Person:**

Print Name: MICHAEL COOPER

Sign Name: Michael Cooper

Date: 3/26/08

**Witnessed by:**

Title: URS

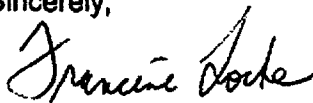
Print Name: Brian Joseph

Sign Name: Brian Joseph

Date: 3/26/08

If you have any questions or comments, please feel free to contact Francine Locke at 215-400-4750 or Jerry Junod at 215 400-6738.

Sincerely,



Francine Locke, MS  
Director, Environmental Management & Services

**School District of Philadelphia**  
**Asbestos Hazard Emergency Response Act (AHERA)**  
**Compliance Audit**

**Principal Interview Form**

The School District of Philadelphia (School District) and the U.S. Environmental Protection Agency, Region III (EPA) entered into a Self-Audit/Self Disclosure Agreement. The purpose of the agreement is to gauge the School District's compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for your school/ facility.

The School District obtained the services of URS Corporation (URS) to conduct the AHERA environmental compliance audit. The audit will focus on the compliance of general information, inspections and reinspections, response actions, operations and maintenance, periodic surveillance, and notifications. This document acknowledges that all environmental documents relevant to the building asbestos management plan have been made available to URS at the time of the audit.

<b>School/ Facility:</b> Chester Arthur Annex 2481
<b>Address:</b> 2007 Christian Street
<b>Date of Audit:</b> 1/29/08

**School Principal:**

Print Name:

Reneé Musgrove

Sign Name:

Reneé Musgrove

Date:

1/29/08

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Attn: Asbestos Coordinator  
Division of Physical Plant  
+ Construction  
333 Market St.  
Harrisburg, PA 17126-0333

2. Article Number  
(Transfer from service label)

7003 2260 0006 5339 9179

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*Cham Jones* ☐ Agent ☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery

MAR 21 2008

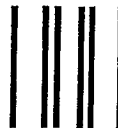
D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

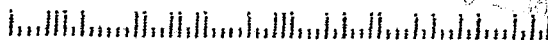
UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

**SCHOOL DISTRICT OF PHILADELPHIA**  
Office of Environmental Mgmt. & Services  
440 N. Broad St., 3rd Fl.  
Philadelphia, PA 19130



# Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit Cross Reference Table

In response to the AHERA Environmental Compliance Audit, a Cross Reference Table has been prepared for inclusion into the AHERA Management Plan. The purpose of this Cross Reference Table is to link the following documents to the AHERA Management Plan.

Cross Reference Table	
3 Year Reinspection Report follows this Cross Reference Table documentation.	
Subject Matter	Location of Required Documents
Designated Person	Pages 1 - 2
Annual Notification	Pages 3 - 5
6 Month Periodic Surveillance Outline of Events	Page 6
3 Year Reinspections Outline of Events	Page 7
Asbestos Management Program (operations and maintenance)	Pages 8 - 19
Asbestos Investigation Report (AIR) Demolition Directive Procedure	<ul style="list-style-type: none"> <li>• Attachment 1</li> <li>• Letter Dated August 4, 2006</li> </ul>
Training (included in the Asbestos Management Program)	<p>The original records are centralized at the School District's Environmental Library. Copies are maintained on staff and are required to be maintained in the latest Re-inspection Report.</p> <p>2 hour awareness training records for all Building Engineers, Custodian Assistants and maintenance personnel.</p> <p>40 hour worker/supervisor training records for the OEMS A-Team and various AST tradesmen.</p>
Response Actions (monthly mailings if applicable)	<p>The original documents are on file at the School District's Environmental Library.</p> <p>Copies of the original are mailed to the School's Main Office for retention with the Management Plan documentation. These documents are typically kept separate from the management plan in an update binder due to the potential volume of response action reports.</p>

**SCHOOL DISTRICT OF PHILADELPHIA  
ASBESTOS DESIGNATED PERSON**

**Gerald F Junod**  
**Office of Capital Programs**  
**Environmental Management & Services**  
**440 N Broad Street, 3<sup>rd</sup> Floor**  
**Philadelphia, PA 19130**  
**Telephone: 215 400 6738**  
**Fax: 215 400 4751**

**Drexel University- Asbestos Building Inspector Course**  
**Drexel University- Asbestos Management Planner Course**

**January 9-11, 1989 24 Hours**  
**January 12-13, 1989 16 Hours**

**Annual Building Inspector Refreshers**

**1990 through 2007 4 Hours**

**Drexel University**  
**Criterion Laboratories, Inc**  
**Access Training Services, Inc.**

**Annual Building Management Planner Refreshers**

**1990 through 1994 4 Hours**

**Drexel University**  
**Criterion Laboratories, Inc**

**Manager, City of Philadelphia Asbestos Control Program**

**Served as the Asbestos Control Program Manager for the City of Philadelphia, Department of Public Health, Air Management Services, Asbestos Control Unit from August 1, 2003 through October 23, 2006.**

**Mid Atlantic Regional Environmental Consortium (MAREC)**

**Former member with attendance and participation commitments of all quarterly EPA Region III and yearly National Asbestos Regulatory Conferences sponsored by the EPA and the National Conference of State Legislators respectively as a representative for the City of Philadelphia Department of Public Health Air Management Services from 1994 through 2006.**

**Philadelphia Environmental Task Force**

**Former member of the Philadelphia Environmental Task force as a representative and point of contact for the City of Philadelphia Department of Public Health Air Management Services Asbestos Control Unit from 2002 through 2006.**

**Asbestos Instructor**

**Worked as the primary instructor for the initial and annual Asbestos Project Inspector training and licensing program as mandated by City of Philadelphia Department of Public Health Asbestos Control Regulations from August 1994 through October 2006.**

**Worked as a lead instructor with an Environmental Consulting Firm and approved by the US EPA for the initial and annual refresher training courses for various asbestos occupational disciplines such as the Building Inspector, Management Planner and Worker/Supervisor from 1991 through 1994.**

**I certify that the general, local agency responsibilities as stipulated in Section 763.84 will be met.**

**Gerald F. Junod**  
**Asbestos Designated Person**  
**Assistant Environmental Manager**  
**Office of Environmental Management and Services**

## **SCHOOL DISTRICT OF PHILADELPHIA**

### **Accreditation Information Statement**

**All persons who inspect for Asbestos Containing Building Materials (ACBM) and who will design or carry out response actions with respect to assumed and confirmed ACBM, will be accredited by an EPA approved course and/or a State Contractors Accreditation Program under Sections 206 (c) and 206 (b) of Title II of the ACT**

**Gerald F. Junod  
Asbestos Designated Person  
Assistant Environmental Manager  
Office of Environmental Management and Services**



SCHOOL DISTRICT OF PHILADELPHIA  
OFFICE OF CAPITAL PROGRAMS  
440 NORTH BROAD STREET, SUITE 373  
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT AND SERVICES /

PHONE (215)-400-4750

September 4, 2007

TO: All Principals  
All Building Administrators  
All Parents/Guardians

FROM: Patrick A. Henwood, Senior Vice President  
Office of Capital Programs

Francine Locke, Manager  
Office of Environmental Management and Services

SUBJECT: Annual EPA Notification Letter

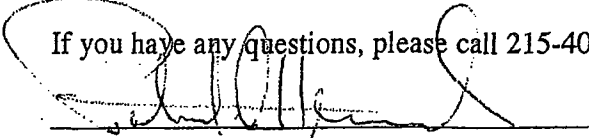
Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 C.F.R. 763.93(g)(4) of public access to environmental records, this letter is to acknowledge the availability of your facility's Asbestos Hazard Emergency Response Act (AHERA) Management Plan.

Enclosed please find a copy of the Notification Letter and a Parents' Signature form informing them of the availability of this information for review. Each member of the school staff is also required to receive a copy of the Notification Letter. At the direction of the Principal, a copy is to be posted on the bulletin boards and an appropriate amount of copies are to be generated for distribution. The signed Parent forms are to be returned to the school and retained with the existing AHERA Management Plan, Three Year Reinspection reports, etc., in a central location by the Principal.

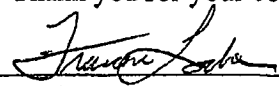
Note: The AHERA Three Year Reinspection reports, in colored binders; Red, Dark Blue, Green, Yellow and White, are Federal EPA mandated inspection documents. The School District of Philadelphia is subject to severe penalties (\$) if the reports and associated paperwork are not available to the EPA and the public upon request.

It is incumbent on designated school personnel to gather and retain this data as it is delivered, in one location for future review. Acceptable locations include the Principal's/Main Office for the primary data and the Building Engineer's Office for the secondary duplicate copies.

If you have any questions, please call 215-400-4750. Thank you for your cooperation.



Patrick A. Henwood  
Senior Vice President  
Office of Capital Programs



Francine Locke, Manager  
Office of Environmental Management  
and Services

File #204  
September 4, 2007

**OFFICIAL NOTICE**

**PLEASE POST**

TO: Principals  
Building Administrators  
Building Engineers  
Building Occupants  
Parents/Guardians

FROM: Patrick A. Henwood, Senior Vice President  
Office of Capital Programs

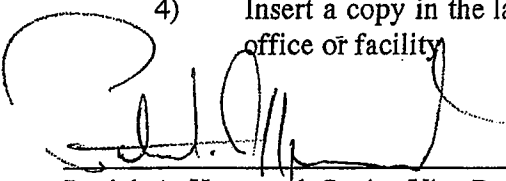
Francine Locke, Manager  
Office of Environmental Management and Services

SUBJECT: Annual Notice: Asbestos Hazard Emergency Response Act

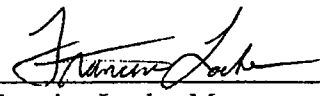
The Federal Register published on October 30, 1987, part III, in Schools: Final Rule and Notice, 763.84 states that each local education agency shall ensure that workers and building occupants or guardians are to be informed at least once each school year about inspections, response actions and post-response action activities including periodic re-inspections and surveillance activities. The School District as the local education agency retains such reports that are available for public inspection in the Office of the Principal or Building Administrator.

The Principal or Building Administrator is required to do the following with this notification:

- 1) Post in a Public Place
- 2) Inform Building Occupants
- 3) A copy of the notification sent to Parents/Guardians (along with the Notification Form to be returned to school)
- 4) Insert a copy in the latest AHERA Three Year Reinspection report (red binder) in your office or facility



Patrick A. Henwood, Senior Vice President  
Office of Capital Programs




Francine Locke, Manager  
Office of Environmental Management  
and Services

SCHOOL DISTRICT OF PHILADELPHIA

Annual EPA Notification Form

September 4, 2007

TO: All Parents or Guardians  
FROM: Francine Locke, Manager   
Environmental Management and Services

This form is to acknowledge receipt of the Annual EPA Notification Letter regarding the availability of the Asbestos Hazard Emergency Response Act (AHERA) Management Plan and Three Year Reinspection reports for review.

This form shall be signed and returned to school for filing with the AHERA Management Plan, etc., by the designated school staff.

Thank you for your timely response.

Students Name (PRINT) \_\_\_\_\_

School (PRINT) \_\_\_\_\_

Grade Level (PRINT) \_\_\_\_\_

Parent/Guardian (PRINT) \_\_\_\_\_

Parent/Guardian Signature \_\_\_\_\_

# SCHOOL DISTRICT OF PHILADELPHIA

Education Center  
440 North Broad Street  
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services

215-400-4750

## AHERA Six Month Surveillance Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.92(b), the following procedure is to be implemented. At least once every six (6) months after a management plan is in effect, each Local Education Agency (LEA) shall conduct a periodic surveillance in each building that it owns or leases that contains Asbestos Containing Building Materials (ACBM) or is assumed to contain ACBM.
- The first bi-annual inspection starts in the Spring (March, April, May) and again in the Fall (October, November, December) of each year. The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspaces/Attics) and rooms in the facility. There is no action required of the Principal.
- The Building Inspector shall visually inspect all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials.
- The Building Inspector shall make a copy of the inspection document and insert into the front of the latest Management Plan (AHERA Three Year Reinspection report). The original document is returned to the LEA's environmental library and filed.

# SCHOOL DISTRICT OF PHILADELPHIA

Education Center  
440 North Broad Street  
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services

215-400-4750

## AHERA Three Year Reinspection Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.85(b) the following procedure is to be implemented. At least once every three (3) years after a management plan is in effect, each Local Education Agency (LEA) shall conduct a reinspection of each building that it owns or leases that contains Asbestos Containing Building Materials (ACBM) or is assumed to contain ACBM.
- Subsequent three year reinspections (2009, 2012, 2015, etc) shall start in the Fall (October, November, December, January). The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspaces/Attics) and rooms in the facility. There is no action required of the Principal.
- An accredited Building Inspector shall visually inspect and touch to determine friability, all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials. The inspectors state of accreditation and license number is required.
- The Building Inspector shall return the reinspection data to the Management Planner to be assessed and determine appropriate response actions and a report issued (AHERA Three Year Reinspection report). One copy of the report is delivered to the schools principal to be permanently retained with all previous environmental data. Another copy is retained in the LEA's environmental library.



**School District of Philadelphia**  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

## **School District of Philadelphia Asbestos Management Program**

## TABLE OF CONTENTS

Definitions	Page 10
1. Introduction	Page 11
2. Summary of Asbestos Management Plan	
3. Asbestos Management Plan Execution	Page 12
a. General Execution	
4. Summary of Program Execution	
a. Asbestos Management Plan Execution	
5. Responsibilities	
a. OEMS	
b. Asbestos Worker/Supervisor "A-TEAM"	Page 13
c. Asbestos Designated Person	
d. Supervisor or Project Manager (Capital, Maintenance & Facilities)	
e. Employee Capital	Page 14
f. Employee Maintenance	
g. Employee Facilities and Custodial	
6. Requirements	Page 15
a. Employee Exposure Monitoring	
b. Employee Notification	
c. Observation of Monitoring	
d. Training Program	
e. Access of Information	
f. Record Keeping	
7. AHERA O&M Plan	Page 16
a. Controls	
b. Work Order System	
c. Regulated Areas	
d. Warning Signs	
e. Warning Labels	
8. O&M Response Actions	Page 17
a. Facility Maintenance Isolation of Area	
b. Unlikely Contact with ACM/PACM	
c. Accidental Disturbance of ACM/PACM	
d. Planned Disturbance of ACM/PACM	
e. Miscellaneous ACM/PACM	Page 18
f. Vinyl Asbestos Floor Tile	
g. Mastic / Adhesives	
h. Woven Vibration Dampers	
i. Other Work Practices	
j. Fiber Release Episodes	
9. References and Resources	Page 19

## DEFINITIONS/ACRONYMS

<b>ACM/PACM</b>	<b>Asbestos Containing Material /Potential Asbestos Containing Material</b>
<b>AHERA</b>	<b>Asbestos Hazard Emergency Response Act</b>
<b>AIR FORM</b>	<b>Asbestos Inspection Report Form</b>
<b>Amended Water</b>	<b>Water to which a surfactant (soap) has been added.</b>
<b>AMP</b>	<b>Asbestos Management Program/Asbestos Management Plan</b>
<b>Asbestos Designated Person</b>	<b>Individual assigned by the district to oversee asbestos related issues</b>
<b>Asbestos Regulated Area</b>	<b>Location that is posted as an asbestos work area in which only approved and accredited personnel are permitted to enter.</b>
<b>AST</b>	<b>Asbestos Support Team involving approved and accredited school district tradespersons personnel that are school district person</b>
<b>A-TEAM</b>	<b>School District of Philadelphia asbestos workers</b>
<b>CIP</b>	<b>Capital Improvement Program</b>
<b>Consultant</b>	<b>Asbestos consulting firm hired by the District</b>
<b>Demolition Directive</b>	<b>Memorandum - August 4, 2006 from Patrick Henwood</b>
<b>EPA</b>	<b>Environmental Protection Agency</b>
<b>In House Personnel</b>	<b>School District of Philadelphia asbestos workers</b>
<b>LEA</b>	<b>Local Education Agency</b>
<b>O&amp;M</b>	<b>Operations and Maintenance</b>
<b>OEMS</b>	<b>Office of Environmental Management and Services</b>
<b>OSHA</b>	<b>Occupational Safety and Health Administration</b>
<b>PEL</b>	<b>Permissible Exposure Limit</b>
<b>PSD or SDP</b>	<b>Philadelphia School District/School District of Philadelphia</b>
<b>PSIT</b>	<b>Philadelphia School Improvement Team</b>
<b>STEL</b>	<b>Short Term Excursion Limit</b>



## **1. Introduction**

The School District of Philadelphia, Asbestos Policy Statement:

The School District of Philadelphia is dedicated to providing a safe and healthful work environment for its employees, students, faculty, contractors and visitors. In recognition of the potential health problems associated with asbestos, the School District of Philadelphia is committed to a comprehensive asbestos control program. This program is implemented and maintained through the School District of Philadelphia's Office of Environmental Management and Services (OEMS).

OEMS has the responsibility of establishing procedures for asbestos abatement, asbestos inspection, air monitoring, renovation and demolition activities within all School District of Philadelphia owned or leased facilities.

These procedures are developed to ensure that:

- (1) People are not exposed to significant levels of asbestos fibers;
- (2) Asbestos waste is handled and disposed of properly;
- (3) Members of the School District of Philadelphia community have access to the Office of Environmental Management and Services for information, assistance, guidance, and interpretation regarding asbestos related matters;
- (4) Members of the School District of Philadelphia community have access to the Asbestos Management Plans as required and outlined in the US EPA AHERA regulations including annual written notification to all parents;
- (5) Compliance with all applicable Federal, State and Local Asbestos Regulations.

Requirements outlined in this manual are mandatory in nature where the word "SHALL" is used and are advisory in nature where the word "SHOULD" is used.

## **2) Summary of Asbestos Management Program**

The School District of Philadelphia's Asbestos Management Program was established to meet the requirements of Federal, State and Local Regulations.

These regulations include, but are not limited to:

- US Environmental Protection Agency Asbestos Hazard Emergency Response Act (US EPA AHERA) and National Emissions Standard for Hazardous Air Pollutants subpart M, Part 61 (NESHAP);
- US Department of Labor, Occupational Safety and Health Administration (OSHA) General Industry Standard (29 CFR 1910.1001) and the OSHA Asbestos Standard for the Construction Industry (29 CFR 1926.1101);
- The Commonwealth of Pennsylvania, Department of Labor and Industry, Asbestos Occupations, Accreditation and Certification Act;
- The City of Philadelphia, Department of Public Health, Asbestos Control Regulations.

### **3) Asbestos Management Program Execution**

#### **a) General Execution**

The Office of Environmental Management and Services(OEMS) develops, implements and manages safety and health programs for the School District of Philadelphia faculty, staff and students and assists with ensuring that all contractors comply with Federal, State and Local Environmental Regulations. The OEMS provides the oversight of School District of Philadelphia employees (Asbestos A-Team), environmental consultants, and asbestos abatement contractors for all projects within the School District of Philadelphia concerning Asbestos Containing Materials.

The control of safety and health hazards at the School District of Philadelphia is primarily through the implementation of engineering, work practice and administrative controls. Personal Protective Equipment (PPE) is used to supplement these controls or whenever the controls are not feasible or are in the process of being implemented. PPE is also recommended whenever exposures to chemical, physical or biological agents can be prevented or reduced by its use.

This written program establishes the procedures necessary to:

- 1) meet established standards and federal regulations for occupational exposure to asbestos fibers;
- 2) meet the requirements of the City of Philadelphia Asbestos Control Regulations which encompasses the disturbance and/or abatement of asbestos containing building materials;
- 3) provide the necessary health and safety protection to School District of Philadelphia staff, faculty, students, contractors and visitors.

This program is strengthened by input and cooperation with the Philadelphia Federation of Teachers (PFT), Health & Welfare Fund.

### **4) Summary of Program Execution**

#### **a) Asbestos Management Program Execution**

The Asbestos Management Program is administered by the Office of Environmental Management and Services (OEMS). OEMS provides the following services primarily through professional consultants:

- (1) exposure monitoring services;
- (2) building inspection/surveys (bulk sampling) for the identification of asbestos containing materials;
- (3) asbestos project design services;
- (4) asbestos abatement project and air monitoring services;
- (5) emergency response to fiber release episodes;
- (6) education/information;
- (7) medical monitoring;
- (8) training for School District of Philadelphia personnel

### **5) Responsibilities**

#### **a) Office of Environmental Management and Services**

OEMS is responsible for performing the following functions:

- (1) Developing and administering of the Asbestos Management Program.
- (2) Providing asbestos-related services to all School District of Philadelphia departments.
- (3) Conducting required training of the Asbestos Management Program and working jointly with departments to schedule training.
- (4) Identifying and posting areas where labeling/signage is required.

- (5) Medical Monitoring of OEMS "A-TEAM" and other departments "AST" Asbestos Program staff.
- (6) Certification and training as required for OEMS "A-TEAM" and other departments "AST" Asbestos Program staff.
- (7) Record keeping as outlined in Section 3.5 and all records as by required by US EPA AHERA regulations.

**b) Asbestos Worker/ Supervisor-"A-TEAM"**

- (1) OEMS shall ensure that all "A-TEAM" workers/supervisors adhere to the following requirements:
  - (a) Attend an initial Worker/Supervisor Asbestos Course;
  - (b) Maintain the annual re-certification per EPA AHERA requirements and Commonwealth of Pennsylvania Asbestos Occupations, Accreditation and Certifications Act;
  - (c) Undergo an annual Asbestos Medical Evaluation;
  - (d) Undergo an annual Respirator Medical Clearance;
  - (e) Undergo an annual Respirator Fit Testing.

**c) Asbestos Designated Person**

The Asbestos Designated Person is responsible for:

- (1) Assuring the health and safety of employees, students and visitors in the School District of Philadelphia facilities under his/her control.
- (2) Being kept informed of all areas under his or her jurisdiction where potential asbestos exposures exist and initiating protection programs that adhere to the Asbestos Management Program requirements of this manual.
- (3) Assuring that Asbestos Management Program requirements are adhered to by principal investigators, project managers, supervisors, or division heads, and School District of Philadelphia personnel under their supervision.
- (4) Ensuring that all employees within the Asbestos Management Program comply with (OSHA 1910.1001 (j) (7) (iv)) and the US EPA AHERA regulations by attending the required training.
- (5) Ensure the posting of:
  - (a) warning labels/signage
  - (b) Commonwealth of Pennsylvania Asbestos Abatement and Demolition/ Renovation Notification form
  - (c) Asbestos Inspection Reports (AIR) form (where required)
  - (d) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

**d) Supervisor or Project Manager (Capital, Maintenance and Facilities)**

Each person in charge of a project, maintenance/repair, renovation/demolition, or other activity from the Departments of Capital, Maintenance, and/or Facilities, where asbestos containing materials may be present is responsible for:

Identifying, with the assistance of OEMS, asbestos containing building materials prior to any disturbance of these materials. Various Federal (EPA and OSHA) and Local (City of Philadelphia Asbestos Control Regulations) require Asbestos Inspections prior to renovation/demolition activities. This shall be accomplished by always following the Asbestos Management Program Procedures as follows:

- (1) Ensure that the requirements of the Asbestos Management Program Procedures are followed by all personnel, trades, and contractors who are involved with the project;

- (2) Review of the required Asbestos Inspections Report (AIR) form (Attachment 1) and AHERA Management Plan documents prior to activities that may disturb any Asbestos Containing Materials;
- (3) Perform all project related duties as outlined in the Project Manager Responsibilities;
- (4) Keep the department chairperson or director informed of any actions proposed or taken regarding the Asbestos Management Program.
- (5) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

**c) Employee – Capital**

School District of Philadelphia Capital employees and/or consultants shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of the projects they are performing or managing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit (a.k.a PSIT Service Request Form) and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

The types of projects represented as part of the Capital Improvement Program are as follows:

- (1) Complete Renovation of an existing building that addresses all facility component concerns and educational program needs;
- (2) Major Renovation of an existing building addressing significant facility component and educational improvements;
- (3) Addition to an existing building (either as an attachment or stand-alone structure) to accommodate needed program space;
- (4) Conversion of an existing facility to accommodate a change in educational program;
- (5) Facility Component Improvement of specific facility needs (i.e. electrical or HVAC system upgrades, ADA improvements, life safety improvements, exterior renovations, etc.).

**d) Employee - Maintenance**

School District of Philadelphia Maintenance employees shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) All employees involved in maintenance activities shall attend required Asbestos Awareness training program within 60 days of employment

**e) Employee – Facilities & Custodial**

School District of Philadelphia Facilities and Custodial employees shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed;
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) All employees involved in Facilities and Custodial activities shall attend required Asbestos Awareness training program within 60 days of employment.

## 2) Requirements

### a) Employee Exposure Monitoring

When information indicates that an employee's exposure to asbestos fibers may equal or exceed an 8-hour time-weighted average of 0.1 f/cc \* (per OSHA 1910.1001 & 1926.1101), OEMS shall develop and implement an asbestos exposure monitoring program. The sampling strategy shall be designed to identify employees by work task (job classification) that is exposed to asbestos fibers that exceed an 8-hour time-weighted average of 0.1 f/cc.

### b) Employee Notification

OEMS shall notify in writing, each employee exposed to asbestos fibers at or above an 8-hour time weighted average of 0.1 f/cc.

### c) Observation of Monitoring

OEMS shall provide employees or their representatives with an opportunity to observe any exposure measurements conducted.

### d) Training Program

OEMS shall institute a training program which meets the requirements of AHERA for all employees who perform maintenance operations in a facility/school which contains asbestos containing materials or presumed asbestos containing materials and 1910.1001 (j), and the Commonwealth of Pennsylvania Department of Labor and Industry and the City of Philadelphia Asbestos Control Regulations. The affected departments shall ensure employee participation in this program. The OEMS "A-TEAM" and other departments "AST" Asbestos Program staff training shall be conducted annually for each employee as required by all Federal, State and Local for each asbestos discipline.

All Asbestos Awareness training as required by AHERA shall be performed within 60 days of employment and shall include:

- o health effects of asbestos
- o locations of ACM and PACM in the building/facility
- o recognition of ACM and PACM damage and deterioration
- o requirements of the OSHA 1910.1001 standard relating to maintenance
- o proper response to fiber release episodes
- o procedure to be followed to isolate areas affected by fiber releases

### e) Access to Information

OEMS shall make available to affected employees or their representative's copies of the Occupational Safety and Health Administration (OSHA) General Industry Standard Part 1910.1001 and the department shall post a copy in the workplace.

### f) Record keeping

OEMS shall maintain an accurate record of all employee exposure measurements. OEMS and/or the School District of Philadelphia Human Resources Department shall maintain records of employee medical monitoring program. OEMS shall maintain all employee training records. All records shall be provided upon request to employees, former employees, representatives designated by the individual employee.

## **7) AHERA OPERATIONS AND MAINTENANCE PLAN**

### **a) CONTROLS**

#### **i) Work Order System**

Minimizing disruption of ACM/PACM during maintenance and renovation activities is the primary goal and task encountered by OEMS. Operations and maintenance employees and contractors should be warned to avoid conducting any maintenance work which may disturb ACM/PACM. Initiating a work order system, where all work orders or requests are channeled through the Office of Environmental Management and Services (OEMS), will be the method used to control and minimize disruption of ACM/PACM.

Any work performed by in-house personnel or contractors that could or will impact ACM/PACM shall be coordinated by OEMS. A completed Asbestos Inspection Report Form (Attachment 1) shall be issued to in-house personnel and/or all contractors whose work could impact ACM/PACM. This form should accompany each contract issued to an outside contractor and posted on the jobsite.

All work order requests for maintenance and renovation activities in areas where ACM/PACM is suspected or known to be present are to be submitted to OEMS prior to proceeding with work. OEMS is responsible for reviewing asbestos survey records for information about the presence of ACM/PACM in the area where the work is to be performed. OEMS should physically inspect the area to ensure existing records reflect actual conditions. If no asbestos is present, a work order is not necessary and the planned actions can proceed. If ACM/PACM is found to be present in the area, OEMS will sign the work order application and obtain an approved and accredited asbestos contractor or assign OEMS "A-TEAM" to abate the ACM/PACM.

#### **ii) Regulated Areas**

The owner will identify and regulate all areas where airborne concentrations of ACM/PACM exceed the Permissible Exposure Limit (PEL)\* (Per OSHA determined to be 0.1 f/cc) and/or short-term exposure limit (STEL) (Per OSHA determined to be 1.0 f/cc), or there is reasonable possibility that the (PEL) and/or (STEL) may be exceeded. All ACM/PACM removal activities involving thermal system insulation ACM/PACM (Class I), surfacing ACM/PACM (Class I), and miscellaneous ACM/PACM such as floor tile, roofing, and siding mastic, etc. (Class II), and repair and maintenance operations where thermal system insulation and surfacing ACM/PACM is likely to be disturbed (Class III) will be performed in accordance with federal, state, and local regulations. All asbestos abatement work and activities will be designated and managed as asbestos regulated areas. These areas will be demarcated and labeled.

#### **iii) Warning Signs**

Warning signs shall be displayed at all approaches to each asbestos regulated area. The asbestos abatement contractor will provide OSHA warning signs in all regulated areas during removal, repair, and other maintenance activities. OEMS will provide AIRs to all contractors who must inform all employees and supervisors working in locations contiguous to asbestos regulated areas of the potential hazards and work practices required.

#### **iv) Warning Labels**

Warning labels and/or signage shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers. Generally, the asbestos abatement contractor or OEMS A-Team personnel will provide all warning labels for ACM/PACM containment.

## **8) O &M RESPONSE ACTIONS**

The Asbestos Management Program general O&M procedures are outlined in this section. Additional requirements specific to asbestos abatement activities are included the Project Design documents for all Asbestos Abatement Work. Regular cleaning, inspection, and reporting of ACM/PACM deterioration or other problems must be diligently practiced by all employees including custodial and maintenance personnel.

### **a) Facility Maintenance Isolation of Area Responsibilities**

Maintenance personnel are often required to work in areas where ACM/PACM may potentially be disturbed. Most maintenance activities are conducted by in-house staff, outside contractors, or a combination.

Emergency fiber release episodes, such as pipe fitting or valve breaks, emergency boiler work, or mechanical equipment repair will be responded to by OEMS A-Team personnel or asbestos abatement contractor personnel. The owner's maintenance staff will: (1) isolate the emergency fiber release area; (2) post warning signs to prevent unauthorized access, and (3) notify their supervisor and OEMS. OEMS will ensure that the fiber release area remains isolated and is properly cleaned by an approved and accredited abatement contractor or by OEMS A-TEAM personnel.

### **b) Unlikely Contact with ACM/PACM**

Maintenance activities or repairs which can be performed without contacting or disturbing the ACM/PACM require little more than normal care and good workmanship. For example, valves which are either uncovered or covered with non-asbestos insulation can be packed or repaired without disturbing asbestos insulation on nearby pipes. The major precaution is to ensure that maintenance and custodial personnel are familiar with procedures such as isolating the area, posting warning signs, and notifying OEMS in the event of any accidental ACM/PACM disturbance.

### **c) Accidental Disturbance of ACM/PACM**

Maintenance & facilities personnel shall notify OEMS any time a fiber release is suspected. If friable ACM/PACM becomes airborne in the building,

### **d) Planned Disturbance of ACM/PACM**

Maintenance activities that may impact ACM/PACM include access to a valve, flange, duct, or related system component.

Where asbestos-containing insulation must be removed to maintain or repair the thermal system, the ACM/PACM will imminently be disturbed. ACM/PACM removal work shall be conducted by OEMS A Team personnel or an approved and accredited asbestos abatement contractor.

If friable ACM/PACM becomes airborne in the building, maintenance and facilities personnel shall secure the area and contact OEMS. OEMS shall respond accordingly.

**e) Miscellaneous ACM/PACM**

Miscellaneous types of ACM/PACM may include vinyl asbestos floor tiles, mastics/adhesives and woven vibration dampers. Disturbance of these materials should be avoided. Routine maintenance activities involving these materials should not pose a problem if handled properly. Questions on the proper removal and disposal of miscellaneous ACM/PACM should be directed to OEMS. OEMS will contact an approved and accredited asbestos abatement contractor or utilize OEMS A-TEAM personnel to assist with miscellaneous ACM/PACM clean-up activities.

**f) Vinyl Asbestos Floor Tile**

Asbestos-containing floor tiles in good condition are considered non-friable unless they are crushed, drilled, sawed, sanded or disturbed by any activity that breaks up the material. Routine maintenance of these materials should employ the use of non-abrasive buffers and wet cleaning techniques. Broken or loose floor tiles should be removed and disposed of as asbestos waste by OEMS. Remaining debris should be vacuumed with a HEPA vacuum and the area wet mopped using amended water.

**g) Mastics/Adhesives**

Mastics and adhesives containing asbestos in good condition are considered non-friable and do not pose a potential health concern unless crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**h) Woven Vibration Dampers**

Woven vibration dampers in good condition are considered non-friable and do not pose a potential health concern unless cut, crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**i) Other Work Practices**

Any special work not included in this section should be addressed directly to OEMS for review prior to the initiation of work that may involve the disturbance of ACM/PACM.

**j) Fiber Release Episodes**

Facilities and maintenance staff should report to OEMS the presence of asbestos debris, water or physical damage to ACM/PACM, or any other evidence of possible fiber release. OEMS should have the OEMS A-Team personnel or an approved and accredited abatement contractor respond to the site to clean up debris and make repairs as soon as possible. OEMS will also contact a consultant to conduct air monitoring and prepare a report and submit at project completion to OEMS for each episode. OEMS will forward the reports for each site location AHERA Management Plan accordingly.



## 9) REFERENCES and RESOURCES

Applicable regulations for asbestos projects impacted by renovation, demolition, and maintenance activities.

- **Philadelphia Air Management Services - Asbestos Control Unit**  
<http://www.phila.gov/health/units/ams/Asbestos/asbestos.html>
- **Pennsylvania Asbestos Occupations, Accreditation and Certification Act**  
<http://www.dli.state.pa.us/landi/cwp/view.asp?a=185&q=56262&landiNav=>
- **United States Environmental Protection Agency Asbestos Home Page**  
<http://www.epa.gov/asbestos/>
- **Occupational Health and Safety Administration (OSHA) Asbestos Home Page**  
<http://www.osha.gov/SLTC/asbestos/>



City of Philadelphia - Department of Public Health  
Public Health Services - Air Management Services  
Asbestos Control Unit - 321 University Av., 19104

Office Use Only

Date Received L&I:

Date Received AMS:

Date Inspected:

Inspector #

## Asbestos Inspection Report

### School District of Philadelphia projects ONLY

1. Name of Building: Phone #

2. Name of Building Owner: School District of Philadelphia  
440 North Broad Street, Philadelphia, PA 19130

Phone # 215-400-4750

3. Name of Licensed Investigator: License #

Phone #

4. Name of Certified Lab: License #

Phone #

5. Scope of Work: (include all locations)

Asbestos Containing Material Present? ☐ Yes (List Below) ☐ No

6. List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. Yes (Investigator) must label all ACM that may be left in the work area. Page 1 of \_\_

Location	Description	Type (Code 1)	Amount		Condition (Code 2)	Action (Code 3)
			Square	Linear		

#### Code 1

FRI - Friable  
NF1 - Non-Friable, Cat. 1  
NF2 - Non-Friable, Cat. 2

#### Code 2

DD - Deteriorated or  
Delaminated  
ND - Non-Damaged

#### Code 3

REM - Removal necessary prior to Demo/Reno  
NRN - No removal necessary, label ACM  
REP - Repair & Label ACM, removal not necessary

I hereby certify that the foregoing statements are true and the information contained in this report is true. This certification is made subject to the penalties set forth in 18 PA. C.S. §4904 relating to unsworn falsification to authorities. Furthermore I certify that the inspection, sampling, and labeling requirements of section X of the Asbestos Control Regulation (ACR) have been met. The building owner has been notified of the ACR requirements and given a copy of this report. If the inspection has revealed ACM which will be disturbed by the proposed work or if it has revealed ACM in bad condition, the building owner has been notified to remove or repair the ACM in accordance with the ACR prior to renovation or demolition activity.

Signature of Licensed Asbestos Investigator:

Date:

Signature of Building Owner:

Date:



Page 2 of \_\_\_\_\_ Project Name: \_\_\_\_\_ Project No. \_\_\_\_\_

6. *continued*

List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. You (Investigator) must label all ACM that may be left in the work area.

Location	Description	Type (Code 1)	Amount		Condition (Code 2)	Action (Code 3)
			Square Ft.	Linear Ft.		

7. List all locations inspected that do **NOT** have asbestos containing material present:

Location	Location	Location	Location

8. List all homogeneous materials present in this school:

ASBESTOS CONTAINING MATERIALS	NON-ASBESTOS MATERIALS

9. Caution labels affixed to all ACM ? ☐ Yes ☐ No

*All contractors' employees involved in the demolition or renovation activity must receive a copy or have access to this Asbestos Inspection Report.*

Signature \_\_\_\_\_ Date \_\_\_\_\_

**THE SCHOOL DISTRICT OF PHILADELPHIA**

**OFFICE OF CAPITAL PROGRAMS**

440 NORTH BROAD STREET, 3RD FLOOR  
PHILADELPHIA, PENNSYLVANIA 19130-4015

TELEPHONE (215) 400-4730

FAX (215) 400-4731

August 4, 2006

TO: All Project Management Personnel

FROM: Patrick Henwood, Director  
Office of Capital Programs

SUBJECT: Construction Projects

Effective immediately, if it is necessary to demolish or open a wall, ceiling or floor as part of a construction project, it is now required that a special assessment be made by the PSIT environmental consultant, prior to commencement. The purpose of this new control is to prevent construction workers from unknowingly being exposed to asbestos containing materials.

This procedure will be as follows: the Construction Manager (CM) will provide the Project Manager (PM) with a two week look-ahead indicating exact locations of surfaces that will need to be demolished or altered. If possible, the CM will clearly mark/label the affected surfaces and/or items. The PM will then notify the Environmental Department who will send a City of Philadelphia licensed investigator to inspect and test the areas. The work may not proceed unless and until the investigator provides a report that clears the area.

Additionally, please ensure that, for all projects, a copy of the latest AHERA report, the appropriate Asbestos Inspection Report and all MSDS are available and posted in conspicuous locations. If environmental concerns are expressed to the CM by construction workers and can not be resolved, please have the CM contact you and the Environmental Department at (215) 400-4730 as soon as possible.

Thank you for your cooperation in this matter.

C. Fred Farino  
Len Dillinger, PE  
Joel Jackson  
Joe Joseph  
Francine Locke  
Gene Becker  
Vince Pagliaro

**U.S. Postal Service<sup>®</sup>**  
**CERTIFIED MAIL<sup>®</sup> RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**USE**

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Send To  
 Division of Physical Plant Construction  
 Street Apt. No.: 333 Market St.  
 City, State, ZIP+4<sup>®</sup> Harrisburg, PA 17126-0333  
 PS Form 3811, February 2004 See Reverse for Instructions

Attn: Asbestos Coordinator

Mar 3/19/08

**SENDER:**

**NOTATION ON DELIVERY**

- Complete item 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Attn: Asbestos Coordinator  
 Division of Physical Plant  
 + Construction  
 333 Market St.  
 Harrisburg, PA 17126-0333

A. Signature

**X**

- ☐ Agent  
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7003 2260 0006 5339 9179



School District of Philadelphia  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

March 17, 2008

Attn: Asbestos Coordinator  
Division of Physical Plant and Construction  
333 Market Street  
Harrisburg, PA 17126-0333

Re: Asbestos Hazard Emergency Response Act (AHERA) Environmental  
Compliance

Attn: Asbestos Coordinator:

I am submitting herewith the asbestos management plan for the School District of Philadelphia as required by the terms of the Asbestos Hazard Emergency Response Act of 1986. This plan was developed with the assistance of Synertech Incorporated and Batta Environmental Incorporated. The inspection was conducted by Synertech Incorporated.

The Asbestos Coordinator for the School District of Philadelphia is

Mr. Jerry Junod  
440 North Broad Street, Room 3053  
Philadelphia, PA 19130  
215-400-6738

All records pertaining to the School District's AHERA Compliance Program are maintained at the above designated location.

If you have any questions or comments, please feel free to contact Francine Locke at 215-400-4750 or Jerry Junod at 215 400-6738.

Sincerely,

A handwritten signature in cursive script, reading "Francine Locke".

Francine Locke, MS  
Director, Environmental Management & Services

# SCHOOL DISTRICT OF PHILADELPHIA

## AHERA

### THREE YEAR REINSPECTION VI

Chester A. Arthur Annex  
(St. Charles)

ULCS# 2481

2007 Christian Street  
Philadelphia, Pennsylvania

December, 2006

*Conducted By:*

Batta Environmental Associates, Incorporated  
Environmental Testing Consultants, LLC  
G & C Environmental Services, Incorporated  
Kleinfelder East, Incorporated  
Synertech Incorporated  
USA Environmental Management, Incorporated

*Prepared By:*

School District of Philadelphia  
Batta Environmental Associates, Incorporated  
Synertech Incorporated

**SCHOOL DISTRICT OF PHILADELPHIA  
EDUCATION CENTER**

440 NORTH BROAD STREET, 3<sup>RD</sup> FLOOR  
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT & SERVICES

PHONE : (215) 400-4750

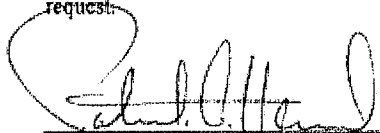
January, 2008

TO: All Principals  
All Building Engineers

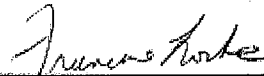
FROM: Francine Locke, Manager  
Environmental Management & Services

SUBJECT: AHERA Reinspection Report

In order to comply with the provisions of the Asbestos Hazard Emergency Response Act (AHERA), the attached report is submitted to you. The law requires that this report be kept in the offices of the principal and the building engineer. It cannot be removed from these locations. All asbestos reports must be available to the public upon request.



Patrick A. Henwood, Director  
Office of Capital Programs



Francine Locke, Manager  
Office of Environmental Management  
and Services



## **AHERA THREE YEAR REINSPECTION VI TABLE OF CONTENTS**

- Transmittal letter
- Table of Contents
- Asbestos Coordinator Accreditation Information Statement
- Executive Summary

### **Section I      Report of Reinspection**

- A. Introduction
- B. Management Planner's Accreditation Statement
- C. Original Management Plan Information
- D. Post-Management Plan Activities and Changes
- E. Three Year Reinspection Overview
- F. Response Actions and Prioritization

### **Section II      Reinspection Data**

- A. Introduction
- B. Building Inspector's Accreditation Statement
- C. Reinspection Form Key
- D. Reinspection Forms
  - 1. Homogeneous Area Reports
  - 2. Specific Location Logs

## **Executive Summary**

The AHERA Three Year Reinspection VI of the Chester A. Arthur Annex (St. Charles), has been completed and the report of the reinspection submitted to the School District of Philadelphia. The reinspection was conducted as a joint project of Batta Environmental Associates, Incorporated, Environmental Testing Consultants, LLC, G & C Environmental Services, Incorporated, Kleinfelder East, Incorporated, Synertech Incorporated and USA Environmental Management, Incorporated. This reinspection was conducted on December 5, 2006 by Vincent Nader, Building Inspector of Synertech Incorporated.

The information contained in the report of the reinspection was obtained from the original Asbestos Management Plan for the school, from update reports on changes and activities since the completion of the Management Plan and from the Three Year Reinspection of the school. This reinspection report was prepared by Jeffrey M. Kuntz, Management Planner of Batta Environmental Associates, Incorporated.

The following Asbestos Containing Building Materials (ACBM), which were identified in the original Management Plan or in the 1992, 1995, 1998, 2001 or 2004 Three Year Reinspection reports, were reinspected for this project:

- **No Applicable Material**

The following Asbestos Containing Building Materials (ACBM), were identified during this AHERA Three Year Reinspection and were not included in the original Management Plan of 1988 or 1989 or in the subsequent AHERA Three Year Reinspection reports:

- **Acoustic Ceiling Tile 1' x 1'** located in the Basement, was identified and ASSUMED to contain asbestos. Damage to this material was observed.
- **Ceiling Tile 1' x 1'** located on the Second Floor, was identified and ASSUMED to contain asbestos. No damage to this material was observed.
- **Floor Tile VAT 9" x 9"** located on the Second Floor, was identified and ASSUMED to contain asbestos. Damage to this material was observed.  
\*\*\* (Note: All Floor Tile must be bulk sampled before any renovation work is performed, unless previously sampled).
- **Floor Tile VAT 12" x 12"** located in the Basement and on the First Floor, was identified and ASSUMED to contain asbestos. Damage to this material was observed in the Basement. No damage to this material was observed on the First Floor. \*\*\* (Note: All Floor Tile must be bulk sampled before any renovation work is performed, unless previously sampled).

## **Section I      Report of Reinspection**

- A. Introduction
- B. Management Planner's Accreditation Statement
- C. Original Management Plan Information
- D. Post-Management Plan Activities and Changes
- E. Three Year Reinspection Overview
- F. Response Action Prioritization

## Section I - A

### Report of Reinspection

#### Introduction

The Three Year Reinspection VI was performed to fulfill the requirements of 40 CFR Part 763 - the Asbestos Hazard Emergency Response Act (AHERA). As required by AHERA, each Local Education Agency (LEA) must reinspect all known confirmed or assumed Asbestos Containing Building Material (ACBM) located in the LEA's facilities. This reinspection is intended to update the original Asbestos Management Plan for the LEA's facilities.

The reinspection of the Chester A. Arthur Annex (St. Charles), was performed on December 5, 2006 by Vincent Nader, Building Inspector of Synertech Incorporated. The report of the reinspection was prepared by Jeffrey M. Kuntz, Management Planner of Batta Environmental Associates, Incorporated.

Accreditation information for the Management Planner is located in *Section I.B.* of this report. Accreditation information for the Building Inspector is located in *Section II.A.* of this report.

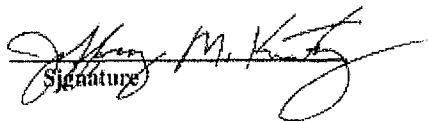
During the reinspection of each School District of Philadelphia facility, the Management Plan for that facility was reviewed. Information from the conclusions section of that report is included in *Section I.C.* of this report. Additionally, information on activities such as abatements, cleanings, sampling and inspections, which have taken place since the completion of the original Management Plan, was reviewed during the reinspection. Information on those activities is included in *Section I.D.* of this report.

**Section I - B**

**MANAGEMENT PLANNER  
ACCREDITATION STATEMENT**

The under-signed Management Planner has reviewed the reinspection data, developed prioritized response actions, and made recommendations for the subject school/facility addressed in this AHERA Three Year Reinspection Report. The scope of this report is based upon the information contained in the Asbestos Hazard Emergency Response Act of 1986, and other Federal regulations and EPA publications. EPA personnel reviewed the report format prior to its finalization.

<b>Management Planner:</b>	Jeffrey M. Kuntz
<b>Employer:</b>	Batta Environmental Associates, Inc.
<b>Telephone Number:</b>	(302) 737-3376
<b>Accreditation Agency:</b>	Central Delaware Training Academy, Inc.
<b>Accreditation Number:</b>	025952

  
Signature

CENTRAL DELAWARE TRAINING ACADEMY, INC.

**JEFFREY M. KUNTZ**

has successfully completed EPA APPROVED

**AHERA MANAGEMENT PLANNER REFRESHER TRAINING**

COURSE LENGTH 4 HOURS

April 17<sup>th</sup>, two thousand-seven

CDTA  
P.O. BOX 1344  
DOVER, DE 19903-1344  
(302) 677-1534

  
DAVID T. STANLEY, PRESIDENT

  
RONALD S. HERCHA, VICE PRESIDENT

EXAM DATE: 041707

EXPIRE DATE: 041708

ID NUMBER CMP070417-0049

## **Section I - C**

### **Original Management Plan Information**

- **No Applicable Data**

## Section I - D

### Post Management Plan Activities/Changes

Information on activities affecting Asbestos Containing Building Materials (ACBMs) at the Chester A. Arthur Elementary School, is contained in updates to the Management Plan. These updates are kept on file by the School District of Philadelphia and were reviewed for this project. Updates to the Management Plan include the following:

#### PERIODIC (SIX MONTH) SURVEILLANCE

##### Month/Year

December, 2006      On December 5, 2006, a Six Month Surveillance of asbestos containing material was conducted at the Chester A. Arthur Annex (St. Charles). The following areas were reported to contain Damaged ACM:

##### LOCATION

##### TYPE OF MATERIAL

Second Floor

Floor Tile VAT 9" x 9"

Basement

Acoustical Ceiling Tile 1'x 1'

Basement

Floor Tile VAT 12" x 12"

#### ABATEMENT

##### Month/Year

- Not Applicable

#### HARD COAT PLASTER INSPECTION

##### Month/Year

- Not Applicable



### **SAMPLING AND ANALYSIS**

**Month/Year**

- **Not Applicable**

### **OPERATIONS AND MAINTENANCE**

**Month/Year**

- **Not Applicable**

## **Section I - E**

### **Three Year Reinspection VI Overview**

Each homogeneous area of Asbestos Containing Building Materials (ACBM) listed in the original Management Plan or in the 1992, 1995, 1998, 2001 or 2004 Three Year Reinspection reports were inspected for the AHERA Three Year Reinspection VI, and the information for that material verified. Any changes to a homogeneous area listed in the updates to the Management Plans were verified. Any area of suspected ACBM found in the course of the reinspection, and not listed in the Management Plan or updates, were either assumed to contain asbestos or sampled and analyzed to determine their asbestos content. Any such new areas either assumed to contain asbestos or determined through analysis to contain asbestos were included in the report of the Three Year Reinspection. The results of the AHERA Three Year Reinspection VI are tabulated in the homogeneous area reports located in *Section II* of this report.

## Section I - F

### Response Action Prioritization

The AHERA Three Year Reinspection VI included the determination of response actions for the Asbestos Containing Building Materials (ACBM) observed at the subject school/facility. The ACBM's were also given prioritization rankings.

The **Response Action (RA)** rating is based on the AHERA regulations, and is comparable to the RA rating found in the "Original Inspection Data" section. The following table details the response actions:

1. Establish O&M Program
  2. Repair and Establish O&M Program
  3. Enclose
  4. Encapsulate
  5. Remove
  6. Partial Removal and Establish O&M Program
- 
- a. **High Priority Response**  
The homogeneous area has been scheduled for abatement or other response action.
  - b. **Medium Priority Response**  
The homogeneous area will be scheduled for abatement or other response action as soon as the high priority responses have been addressed.
  - c. **Low Priority Response**  
The homogeneous area will be scheduled for abatement or other response action as soon as the medium priority responses have been addressed.
  - d. **On-Going Response/Operations and Maintenance**  
The homogeneous area does not require abatement at present, and should be included in the facility's on-going operations and maintenance program.

The response actions and prioritization rankings for the subject school/facility, as determined in the Three Year AHERA Reinspection VI, are as follows:

**Priority****Homogeneous Area/Response Action****Medium Priority Response**

**HA#**            2481/01/0B /DD

**Material:**    Acoustic Ceiling Tile 1' x 1'

**Location:**    Basement

**RA#**            6/B

**Low Priority Response**

**HA#**            2481/01/02 /CC

**Material:**    Floor Tile VAT 9" x 9"

**Location:**    Second Floor

**RA#**            6/C

**HA#**            2481/01/0B /EE

**Material:**    Floor Tile VAT 12" x 12"

**Location:**    Basement

**RA#**            6/C

**On-Going Response/  
Operations and Maintenance**

**HA#**            2480/01/01/AA

**Material:**    Floor Tile VAT 12" x 12"

**Location:**    First Floor

**RA#**            1/D

**HA#** 2480/01/02/BB

**Material:** Ceiling Tile 1' x 1'

**Location:** Second Floor

**RA#** 1/D

## **Section II      Reinspection Data**

- A. Introduction
- B. Building Inspector's Accreditation Statement
- C. Reinspection Form Key
- D. Reinspection Forms
  - 1. Homogeneous Area Information Report
  - 2. Specific Location Logs

## **Section II - A**

### **Reinspection Data**

#### **Introduction**

The following information documents in the Three Year Reinspection VI of the subject school/facility. The homogeneous area reports were produced using the building inspector's field data on the facility. Key to the homogeneous area report is located immediately prior to that portion of the report.

Section II - B

**BUILDING INSPECTOR  
ACCREDITATION STATEMENT**

The undersigned building inspector has applied the scope and procedures of the AHERA Three Year Reinspection to the subject school/facility addressed in this report. The inspection techniques utilized for this inspection are based on those recommended in EPA guidelines.

**Building Inspector:** Vincent Nader

**Employer:** Synertech, Inc.

**Telephone Number:** (215) 755-2305

**Accreditation Agency:** Access Training Services, Inc.

**Accreditation Number:** 040617

Vince Nader  
Signature



# Certificate of Completion

*awarded to*

**Vincent Nader**

*for successfully completing the prescribed course of study in*

**EPA/AHERA/Pennsylvania Asbestos  
Building Inspector Course**

*under TSCA Title II*

*presented by*

**ACCESS TRAINING SERVICES, INC.**

706 West Maple Avenue, Merchantville, New Jersey 08109  
(856) 665-3449

6/5/06 - 6/7/06

*Course Date*

6/7/06

*Exam Date*

6/7/07


*Expiration Date*

N/A

*Social Security Number*

ACC-0606-S-003

*Certificate Number*

  
Mark K. Schlager  
Training Director

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>
<b>ULCS#</b>	Individual identification number assigned to each school within the School District of Philadelphia.
<b>HOMOGENEOUS AREA ID#</b>	Identification number assigned to each homogeneous area in a school/facility. Each section of the homogeneous area ID is significant.  1010/01/01/01 <b>A B C D</b>  <b>A.</b> Is the ULCS# for the school. <b>B.</b> Designates the specific building/building area within the school. <b>C.</b> Designates the floor or level within the building/building area. <b>D.</b> Designates the homogeneous material within that floor or level. Note: Item D may be a number or a letter.
<b>SYSTEM AFFECTED</b>	Corresponds to the AHERA system for classifying materials.  <b>T</b> : Thermal System <b>S</b> : Surfacing System <b>M</b> : Miscellaneous
<b>ITEM AFFECTED</b>	Is a description of the homogeneous material.
<b>ORIGINAL INSPECTION DATA</b>	This section contains the information found in the original Management Plan (1988-1989).
<b>AMOUNT OF MATERIAL/ UNIT</b>	Quantity of material, and measuring unit. Units include: Square Feet (SF) Each (EA) Linear Feet (LF) Cubic Feet (CF).

**SCHOOL DISTRICT OF PHILADELPHIA  
ASBESTOS THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>
<b>CND Condition</b>	Corresponds to ASHERA condition rating for materials.  0 : No Damage 1 : Damage 2 : Significant Damage
<b>DP Damage Potential</b>	Corresponds to the ASHERA material assessment system.  1 : Potential for Damage 2 : Potential for Significant Damage
<b>ASMD Assumed Asbestos</b>	This means that a material was not sampled for asbestos content during the original Management Plan inspection.
<b>RA Response Action</b>	This corresponds to the ASHERA system of response action rating for materials.  1 : Establish O&M Program 2 : Repair and Establish O&M Program 3 : Enclose 4 : Encapsulate 5 : Remove 6 : Partial Removal and Establish O&M Program
<b>CHANGES</b>	This section describes changes to the homogeneous material in the eighteen years since the original ASHERA inspection. The abbreviations are defined below.  RMVD : Removed ENCL : Enclosed ENCP : Encapsulated DMGD : Damaged SMPLD : Sampled MTRL : Material RPRD : Repaired N/L : None Located RPLCD : Replaced

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

**ITEM**

**DEFINITION**

---

**d. On-Going Response/Operations and Maintenance**

The homogeneous material does not require abatement or other response action at present, and should be included in the facility's on-going operations and maintenance program.

The information presented in the changes section has been compiled from a variety of sources, including the Reinspection and the following:

- \* Quality Control/Quality Assurance Reports of asbestos abatement projects, prepared by consultants to the School District.
- \* Permit and Notification Forms for asbestos abatement projects.
- \* Periodic Surveillance Forms
- \* Operations and Maintenance activities performed by School District personnel.
- \* Verbal information from School District personnel.
- \* Reports of sampling and analysis of suspected materials by both School District personnel and outside consultants.

**SPECIFIC  
LOCATION  
LOG**

This section gives information, including damage amount and location, for a specific homogeneous material on a room by room basis and follows the reinspection form.

*NOTE:* The disparate nature of the above sources of information prohibits the verification of much information within the scope of the AHERA Three Year Reinspections. Discrepancies and omissions may exist in this information, and therefore is included on an "as is" basis. The inspectors for the Three Year Reinspection VI evaluated homogeneous areas based on the materials current condition and location, as evidenced during the inspector's site visit.

## Homogenous Area Information Report By ULCS Location Three Year Reinspection

Building Inspector: Vincent Nader  
Number: 040617

Management Planner: Jeffrey M. Kuntz  
Number: 025952

**Reinspection Date:** 12 / 05 / 06

Homo Area ID: 2481 / 01 / 01 / AA	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL	100 SF	0	0	1	No	1/D

Homo Area ID: 2481 / 01 / 02 / BB	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Ceiling Tile 1' x 1'						MTRL	2800 SF	0	0	1	No	1/D

Homo Area ID: 2481 / 01 / 02 / CC	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 9" x 9"						MTRL DMGD	3760 SF	1	10 SF	1	No	6/C

Homo Area ID: 2481 / 01 / 0B / DD	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Acoustic Ceiling Tile 1'x 1'						MTRL DMGD	11125 SF	1	15 SF	1	Yes	6/B

Homo Area ID: 2481 / 01 / 0B / EE	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL DMGD	1617 SF	1	1 SF	1	No	6/C

.....

### Specific Location Log

School Name: Chester A. Arthur Annex (St. Charles)	ULCS #: 2481
Homogenous ID #: 2481 / 01 / 01 / AA	Date: 12 / 05 / 06
Homogenous ID Description: Floor Tile VAT 12" x 12"	

[illegible]

[illegible]

### Specific Location Log

<b>School Name:</b> Chester A. Arthur Annex (St. Charles)	<b>ULCS #:</b> 2481
<b>Homogenous ID #:</b> 2481 / 01 / 02 / BB	<b>Date:</b> 12 / 05 / 06
<b>Homogenous ID Description:</b> Ceiling Tile 1' x 1'	

[illegible]

1

$$e^{-\frac{1}{2}(\mathbf{r}-\mathbf{r}_0)^T \mathbf{A}(\mathbf{r}-\mathbf{r}_0)} e^{-\frac{1}{2}(\mathbf{r}-\mathbf{r}_0)^T \mathbf{B}(\mathbf{r}-\mathbf{r}_0)}$$

### Specific Location Log

<b>School Name:</b> Chester A. Arthur Annex (St. Charles)	<b>ULCS #:</b> 2481
<b>Homogenous ID #:</b> 2481 / 01 / 02 / CC	<b>Date:</b> 12 / 05 / 06
<b>Homogenous ID Description:</b> Floor Tile VAT 9" x 9"	

[illegible]



.....

### Specific Location Log

School Name: Chester A. Arthur Annex (St. Charles)	ULCS #: 2481
Homogenous ID #: 2481 / 01 / 0B / DD	Date: 12 / 05 / 06
Homogenous ID Description: Acoustic Ceiling Tile 1' x 1'	

[illegible]

2015

### Specific Location Log

School Name: Chester A. Arthur Annex (St. Charles)	ULCS #: 2481
Homogenous ID #: 2481 / 01 / 0B / EE	Date: 12 / 05 / 06
Homogenous ID Description: Acoustic Ceiling Tile 1' x 1'	

1999



**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>
<b>THREE YEAR REINSPECTION DATA</b>	This section contains the information obtained from the Three Year Reinspection VI. With three exceptions, the information categories are identical in format and meaning to those found in the original inspection data section. The three exceptions are defined below.
<b>DMGD AMT Amount Damaged</b>	This section gives the quantity of damaged material in a homogeneous area. The quantity is shown in the same format as the amount of material/unit section.
<b>NF Newly Friable</b>	This section identifies materials in the original Management Plan which have since become friable.
<b>RA Response Action</b>	<p>This rating is based on the AHERA regulations, and is comparable to the RA rating found in the "Original Inspection Data" section. The following table details the response actions.</p> <ol style="list-style-type: none"><li>1. Establish O&amp;M Program</li><li>2. Repair and Establish O&amp;M Program</li><li>3. Enclose</li><li>4. Encapsulate</li><li>5. Remove</li><li>6. Partial Removal and Establish O&amp;M Program</li></ol> <ol style="list-style-type: none"><li>a. <b>High Priority Response</b> The homogeneous material has been scheduled for abatement or other response action.</li><li>b. <b>Medium Priority Response</b> The homogeneous material will be scheduled for abatement or other response action as soon as the high priority responses have been addressed.</li><li>c. <b>Low Priority Response</b> The homogeneous material will be scheduled for abatement or other response action as soon as the medium priority responses have been addressed.</li></ol>

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR REINSPECTION VI**

**REINSPECTION FORM KEY**

**ITEM**

**DEFINITION**

---

**d. On-Going Response/Operations and Maintenance**

The homogeneous material does not require abatement or other response action at present, and should be included in the facility's on-going operations and maintenance program.

The information presented in the changes section has been compiled from a variety of sources, including the Reinspection and the following:

- \* Quality Control/Quality Assurance Reports of asbestos abatement projects, prepared by consultants to the School District.
- \* Permit and Notification Forms for asbestos abatement projects.
- \* Periodic Surveillance Forms
- \* Operations and Maintenance activities performed by School District personnel.
- \* Verbal information from School District personnel.
- \* Reports of sampling and analysis of suspected materials by both School District personnel and outside consultants.

**SPECIFIC  
LOCATION  
LOG**

This section gives information, including damage amount and location, for a specific homogeneous material on a room by room basis and follows the reinspection form.

*NOTE:* The disparate nature of the above sources of information prohibits the verification of much information within the scope of the AHERA Three Year Reinspections. Discrepancies and omissions may exist in this information, and therefore is included on an "as is" basis. The inspectors for the Three Year Reinspection VI evaluated homogeneous areas based on the materials current condition and location, as evidenced during the inspector's site visit.

## Homogenous Area Information Report By ULCS Location Three Year Reinspection

Building Inspector: Vincent Nader  
Number: 040617

Management Planner: Jeffrey M. Kuntz  
Number: 025952

Reinspection Date: 12 / 05 / 06

Homo Area ID: 2481 / 01 / 01 / AA	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL	100 SF	0	0	1	No	1/D

Homo Area ID: 2481 / 01 / 02 / BB	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Ceiling Tile 1' x 1'						MTRL	2800 SF	0	0	1	No	1/D

Homo Area ID: 2481 / 01 / 02 / CC	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 9" x 9"						MTRL DMGD	3760 SF	1	10 SF	1	No	6/C

Homo Area ID: 2481 / 01 / 0B / DD	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Acoustic Ceiling Tile 1'x 1'						MTRL DMGD	11125 SF	1	15 SF	1	Yes	6/B

Homo Area ID: 2481 / 01 / 0B / EE	ORIGINAL INSPECTION DATA					CHANGES	THREE YR. REINSPECTION DATA					
System Affected: Miscellaneous	Amount of MTRL/Unit	CND	DP	ASMD	RA		Amount of MTRL/Unit	CND	DMGD AMT	DP	NF	RA
Item Affected: Floor Tile VAT 12" x 12"						MTRL DMGD	1617 SF	1	1 SF	1	No	6/C

**Abstract**

### Specific Location Log

<b>School Name:</b> Chester A. Arthur Annex (St. Charles)	<b>ULCS #:</b> 2481
<b>Homogenous ID #:</b> 2481 / 01 / 01 / AA	<b>Date:</b> 12 / 05 / 06
<b>Homogenous ID Description:</b> Floor Tile VAT 12" x 12"	

[illegible]

1. *Phacelia*

### Specific Location Log

<b>School Name:</b> Chester A. Arthur Annex (St. Charles)	<b>ULCS #:</b> 2481
<b>Homogenous ID #:</b> 2481 / 01 / 02 / BB	<b>Date:</b> 12 / 05 / 06
<b>Homogenous ID Description:</b> Ceiling Tile 1' x 1'	

addition,



**SCHOOL DISTRICT OF PHILADELPHIA  
DEPARTMENT OF ENVIRONMENTAL SERVICES**

### Specific Location Log

School Name: Chester A. Arthur Annex (St. Charles)	ULCS #: 2481
Homogenous ID #: 2481 / 01 / 02 / CC	Date: 12 / 05 / 06
Homogenous ID Description: Floor Tile VAT 9" x 9"	

[illegible]

1997

### Specific Location Log

School Name: Chester A. Arthur Annex (St. Charles)	ULCS #: 2481
Homogenous ID #: 2481 / 01 / 0B / DD	Date: 12 / 05 / 06
Homogenous ID Description: Acoustic Ceiling Tile 1' x 1'	

[illegible]

مجلسه

10

[illegible]



SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN  
Updated as of: March 26, 2008

Facility Name: Chester A. Arthur Annex Elementary School #2481  
Facility Address: 2007 Christian Street, Philadelphia, PA 19146  
Date of Audit: 1/29/08  
Date CAP submitted to EPA: 3/28/08

Finding Number	Regulatory Citation	Finding	Corrective Action	Corrective Action Status	Preventative Measure	Preventative Measures Status (include date when closed)	Extension Filed (Y/N)	Exhibit Reference	Approximate Cost to Close Finding	Potential Reduction of Pollutants *INCLUDE AMT OF OIL
ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E										
1	(40 CFR § 763.93(a)(2))	An initial management plan was not found. This location is leased by the School District of Philadelphia. The date this building was initially leased was not found. The regulations require the LEA to complete the management plan prior to use as a school building. For buildings leased after October 12, 1988 the LEA must submit the plan to the Pennsylvania Department of Education.	Draft an asbestos management plan and Submit copy the plan and the latest Reinspection Report to the agency designated by the Governor.	Closed- 3/26/08- A copy of the 2006 Reinspection Report was sent to the Department of Education via certified mail.	Develop a written plan that will ensure leased locations are inspected prior to its use as a school building. Maintain accurate up-to-date information regarding buildings that are planned for leasing.	In Progress	N	1	\$400	Recordkeeping violation
2	(40 CFR § 763.93(e)(9))	The school is required to maintain a schedule for completing the 3 Year Reinspections and 6 Month Periodic Surveillance Inspections in the Asbestos Management Plan. No written schedule was identified as part of the Asbestos Management Plan.	A written schedule must be established and implemented for the 3 Year Reinspections and 6 Month Periodic Surveillance Inspections. These schedules must be included as part of the Asbestos Management Plan.	Closed 3/26/08- A written schedule was developed by Jerry Junod and Michael Cooper. A copy of this schedule was reviewed by URS. Copies have been inserted into the latest reinspection report in the Environmental Library and at the School.	Implement and track the Reinspection schedule in a compliance calendar so that the 30 day update can be tracked for the next 6 Month Periodic Surveillance Inspections and 3 Year Reinspection in 2009.	In Progress	N	2	\$1,600	Recordkeeping violation
3	(40 CFR § 763.85(b)(1)(vii))	The regulations require that the 3 Year Reinspections records be updated within 30 days of the inspection. The 2006- 3 Year Reinspection Report has not been printed for inclusion in the Central File at 440 N. Broad Street. The most recent Reinspection Report is dated December 2003. A copy of the 2006 Reinspection report was available for review at the Arthur School. Please note that all files for the Arthur annex are kept at the Arthur School located across the street.	Print the Reinspection Report and place in the Central File at 440 N. Broad Street. The 3 Year Reinspection records must be updated within 30 days of the actual inspection	Closed 3/26/08- A copy of the 2006 Reinspection Report was printed and for the Environmental Library.	Implement and track the Reinspection date in a compliance calendar so that the 30 day update can be tracked by both the school and personnel in the central office for the next 3 Year Reinspection in 2009.	In Progress	N	3	\$400	Recordkeeping violation
4	(40 CFR § 763.91(a))	The school must maintain an Operation and Maintenance program as part of the Asbestos Management Plan. No written plan was identified for operations, maintenance, and repair to address facility ACBM including cleaning, maintenance activities, and fiber release episodes	Develop a written plan for operations, maintenance, and repair to address facility ACBM including cleaning, maintenance activities, and fiber release episodes and incorporate this document into the management plan.	Closed- 3/26/08- The Asbestos Management Program for Operations and Maintenance Activities was prepared by Jerry Junod and was inserted into the latest reinspection report in the Environmental Library and at the School.	The operations and maintenance plan must be updated if there are any changes in procedures. A review, which is tracked on a compliance calendar, of the Asbestos Management Plan should be completed annually to identify these types of plan elements changes.	In Progress	N	4	\$2,400	Recordkeeping violation
5	(40 CFR § 763.84 (g))	The LEA must maintain a current Designated Person (DP) for the School District. The DP responsible for asbestos management activities has not been documented in writing in the 3- year reinspection reports since 2003.	Mr. Jerry Junod has been designated as the DP and he does hold the required training background. However, the School District is in the process of updating the DP records within the Asbestos Management Plan. The School District is adding the required information about the current DP to the 2006 Reinspection Report which are currently being reproduced.	Closed- 3/26/08- The Designation Person documentation required was created. Copies have been added to the latest reinspection report in the Environmental Library and at the school.	The Asbestos Management Plan should be updated any time there is a change in the Designated Person. A review, which is tracked on a compliance calendar, of the Asbestos Management Plan should be completed annually to identify these types of personnel changes.	In Progress	N	5	\$400	Recordkeeping violation
6	(40 CFR § 763.94)	The preventive measures, response actions, training records, and periodic surveillances are a required part of an Asbestos Management Plan. These documents are maintained separately with no link to the Asbestos Management Plan.	The records regarding all preventive measures, response actions, training and periodic surveillance must be included in the Asbestos Management Plan. Documents could be linked to the management plan via cross reference table while incorporating the cross reference table into the management plan.	Closed- 3/26/08- A Cross Reference table was prepared by URS and inserted into the latest reinspection report in the Environmental Library and at the School.	The cross reference table must be updated if there are any changes to the record keeping documents. A review, which is tracked on a compliance calendar, of the Asbestos Management Plan should be completed annually to identify these types of record keeping changes.	In Progress	N	6	\$1,600	Recordkeeping violation